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U.S. DISTRICT COURT E.D.N.Y.**BHATIA & ASSOCIATES, P.C.,**38 West 32nd Street # 1511
New York, NY 10001

★ OCT 4 2005 ★

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Ref. No. 1219/05

September 23, 2005

Hon'ble Robert M. Levy
U.S. Magistrate Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re.: Yashraj Films Music vs., Movie Time Video et al
Docket No. 04-CV-05107 (16)
Request for Extension of time for completing the discovery

Hon'ble Judge:


Our office has been recently retained by the defendants, Ravinder Chopra, Shalu Suri, GSM Corp. Inc., Shan Telecommunication Industrial Inc., and STI Telephone Card Warehouse Inc. The defendants, Ravinder Chopra and Shalu Suri, appeared and conducted the proceedings in the above matter as *pro se*. The Court has scheduled deadlines for completion of discovery by September 30, 2005.

We request you to extend the discovery deadline up to October 31, 2005. Megha Bhouraskar, Esq., of Poppe & Bhouraskar, LLP, the attorneys for the plaintiff, has consented to the extension of discovery deadline.

We also request you to extend the preliminary conference in the matter which has been scheduled presently on October 19, 2005, to a date after October 31, 2005.

We, therefore, request you to pass an order extending the discovery deadline.

Respectfully submitted,


SATISH K. BHATIA (SB-9222)
BHATIA & ASSOCIATES P.C.,
Encl: A copy of notice of appearance.
Cc ... Megha Bhouraskar, Esq.,
Poppe & Bhouraskar, LLP
350 Fifth Avenue, # 7324
New York, NY

APPLICATION GRANTED:
CONFERENCE ADJOURNED TO 11/8/05

@ 2:15 PM

SO ORDERED: s/Robert Levy
U.S. Magistrate Judge

MOVANT'S COUNSEL IS DIRECTED
TO SERVE A COPY OF THIS ORDER
ON ALL PARTIES UPON RECEIPT